

EXHIBIT B

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ROBERT P. "SKIP" CUMMINS

Plaintiff

-Against-

SUNTRUST CAPITAL MARKETS, INC.,
AMIT HAZAN, AND JONATHAN BLOCK

Defendants

Case Number: 07 CV 4633 (JGK)

JURY DEMAND

PLAINTIFF'S PROPOSED SCHEDULING ORDER

The following schedule shall govern the disposition of this case:

1. New Parties shall be joined by: October 31, 2007
2. Discovery shall be completed by: 270 days from the date of the filing of the Proposed Schedule.
3. Plaintiff shall file any amendment to pleadings without leave of Court by: 60 days prior to the close of Discovery
4. Defendants shall file any amendment to pleadings without leave of Court by: 40 days prior to the close of Discovery
5. Expert Witnesses for Plaintiff shall be designated and a report furnished by: 90 days prior to the close of Discovery
6. Expert Witnesses for Defendants shall be designated and a report furnished by: 30 days after Plaintiffs' Expert Witnesses are designated
7. Rebuttal Experts for Plaintiff shall be designated and a report furnished by: 30 days after Defendants' Expert Witnesses are designated

8. Dispositive motions must be filed by: 20 days after the close of discovery
9. All other pretrial motions (including *Daubert* motions, but not including motions in limine) will be filed by: 20 days after the close of discovery
10. Joint Pretrial Order shall be filed by: 30 days after the close of discovery
- Signed this ____ day of _____, 2007.

Honorable John G. Koeltl
United States District Judge

Respectfully submitted this
26th day of July, 2007,

/s/ Ashton Bachynsky
Julius Glickman (JG 2972)
Ashton Bachynsky (AB 7998)
GLICKMAN & HUGHES, L.L.P.
909 Fannin, Suite 3800
Houston, Texas 77010
713.658.1122
713.658.0925 - FAX

-and-

Alan Heblack (AH 1219)
SNITOW KANFER HOLTZER & MILLUS
575 Lexington Avenue
New York, NY 10022-6102
212.317.8500
212.317.1308 - FAX

ATTORNEYS FOR PLAINTIFF